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8 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 03-40210 CRB
14 Plaintiff,)
15 v.) **UNITED STATES' OPPOSITION TO**
16 MOHAMMAD YOUSUF CHAUDHRY,) **DEFENDANT CHAUDHRY'S REQUEST FOR**
17 Defendant.) **PERMISSION TO TRAVEL**

19 The United States respectfully opposes the defendant's request for permission to travel to
20 Pakistan. While the defendant has been permitted to travel in the past, the United States believes
21 that the defendant's conviction of multiple offenses, carrying a sentence of up to 10 years of
imprisonment, provides him with a greater incentive to flee than previously existed. Moreover, in
23 light of the defendant's mental state, which the Court has found renders him incompetent to be
sentenced, the United States believes that it is inappropriate for the Court to allow the defendant
25 to travel unsupervised for a lengthy period of time. The United States believes that the defendant
26 is in need of long-term care and treatment for his mental illness.

27 Moreover, in light of the Ninth Circuit's ruling, the United States will be requesting that
28 the Court order periodic reevaluations of the defendant to determine if he regains competency so

1 that he may be sentenced. The United States believes that the defendant should not be permitted
2 to take a lengthy trip to Pakistan while his mental state is still under evaluation.

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5 DATED: May 25, 2012

Respectfully Submitted,

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MELINDA HAAG
United States Attorney

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/s

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KIRSTIN M. AULT
Assistant United States Attorney

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